

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

PATTRICK SNEED JR.,)	
)	
Plaintiff,)	
)	
vs.)	Civil Action No.: 1:23-mi-99999
)	
AJA DAVIS,)	
)	
Defendant.)	

COMPLAINT

NOW COMES the Plaintiff, Patrick Sneed Jr., individually (Plaintiff), by and through counsel of record, and files this Complaint for Damages against the Defendant, Aja Davis individually (“Defendant”), showing this Honorable Court as follows:

1. This Court has jurisdiction of this controversy on grounds that the Plaintiff is an individual resident citizen of the State of Alabama, and that the Defendant, Aja Davis, is an individual resident citizen of the State of Georgia who committed tortious acts in this state, district and division (hereinafter referred to as “Davis”). The amount in controversy exceeds \$75,000 exclusive of interest and costs to the Plaintiff. This Court has jurisdiction under 28 U.S.C. §1332, based on diversity of citizenship and amount in controversy.

PARTIES, JURISDICTION, AND VENUE

2. The Plaintiff is an individual resident citizen of the State of Alabama residing in Lee County, Alabama.

3. Defendant Davis is an individual and owns and operated a 2006 Mazda Tribute SUV, VIN 4F2YZ06166KM25387, that was involved in the crash that forms the basis for this lawsuit.

4. Defendant Davis is subject to the jurisdiction of this Court.

5. Venue is proper in this Court as to Defendant Davis.

FACTS

6. On or about the 14th day of October, 2021, on a public highway in Fulton County, Georgia namely on the road of N Camp Creek Pkwy SW at the intersection of Stone Hogan Conn SW, inside the city of Atlanta, Defendant Davis did negligently, recklessly and wantonly cause or allow a motor vehicle, namely a 2006 Mazda Tribute SUV, VIN 4F2YZ06166KM25387, to collide with a motor vehicle being drive, occupied and operated by Plaintiff Pattrick Sneed Jr. whose vehicle was a 2015 Lincoln MKZ, VIN 3LN6L2LU6FR624143, was own by said Plaintiff.

7. As a proximate consequence of the negligence, recklessness, and wantonness and other conduct of the Defendant Davis, the Plaintiff Pattrick Sneed Jr. was seriously injured and suffered damage to his property.

8. Defendant acted grossly negligently, wantonly and otherwise such that he is liable to the Plaintiff for punitive damages as well as for the losses described herein. Defendant Davis is liable for all the damages suffered by the Plaintiff, Patrick Sneed Jr., both compensatory and punitive.

COUNT I

NEGLIGENCE OF AJA DAVIS

9. Plaintiff incorporates herein by reference the allegations of the previous paragraphs of this Complaint as if each were fully set forth herein in their entirety.

10. At all times material hereto, Defendant Davis was driving a 2006 Mazda Tribute SUV vehicle was subject to Georgia traffic laws and safety regulations.

11. At all times material hereto, Defendant Davis was also subject to obey all Georgia traffic laws and safety regulations.

12. Defendant Davis was negligent in the operation of the 2006 Mazda Tribute SUV, in addition, he violated Georgia Motor Vehicle Laws including O.C.G.A. §40-6-73 (Failure to yield the right-of-way), which constitutes negligence per se.

COUNT II

PUNITIVE DAMAGES

13. Plaintiff repeats, re-alleges and incorporates the allegations of the preceding paragraphs of this Complaint as if each were fully set forth herein in their entirety.

14. Defendants Davis's acts were willful, wanton, and demonstrated that entire want of care which raises the presumption of a conscious indifference to consequences.

15. Accordingly, said Defendant is liable to the Plaintiff for punitive damages to punish, penalize, and deter Defendant from similar conduct in the future.

WHEREFORE, Plaintiff prays that the following relief be granted: (a) A trial by jury; (b) For Summons and Complaint to issue against the Defendant; (c) For judgment against the Defendants, jointly and severally, to compensate Plaintiff for their pain and suffering, past, present, and future; (d) For judgment against the Defendant, jointly and severally, in an amount of \$250,000.00, to fully compensate Plaintiff; (e) For all such other economic and non-economic loses as may be shown at the hearing of this matter to the full extent allowed under law; (f) That the Plaintiff obtain a judgment against the Defendant in the amount of \$250,000.00, or in an amount determined to be fair and reasonable in the minds of a fair and

impartial jury; (g) Punitive damages be recovered in an amount the jury believes to be just, fair and equitable, given the facts and issues in this case; (h) Court costs, discretionary costs, and prejudgment interest; and (i) For all such further and general relief which this Court deems just and proper.

/s/ Thomas J. Knight

Thomas J. Knight
Georgia Bar # 426250
Attorney for Plaintiff
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Anniston, Alabama 36202
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JURY DEMAND

NOW COMES the Plaintiff and demands trial by jury of all issues in this civil action.

/s/ Thomas J. Knight

Thomas J. Knight
Attorney for Plaintiff

Defendant may be served at the following address:

Aja Davis
417 N Forrest St.
Valdosta (Lowndes), Georgia 31601